



City of Fort Worth, Texas

Comments on Notice of Inquiry

Department of Commerce, National Telecommunications and Information Administration

Docket No. 120928505–2505–01 RIN 0660–XC002

Development of the Nationwide Interoperable Public Safety Broadband Network

Submission Date: November 9, 2012

It is encouraging to see the FirstNet Board moving quickly to meet this critical need and to be requesting input. Balancing the need to get decisions made in a timely manner to ensure the network is built as quickly as possible and collecting input will be a significant challenge. Significant considerations for the network are identified below:

**The need for this network is great and immediate.** In the absence of a Nationwide Interoperable Public Safety Broadband Network, Public Safety’s increasing need for information (data/video/etc.) has forced them to use commercial networks. These networks typically do not fully provide the capacity nor the redundancy required for Public Safety. The FirstNet board should continue to move quickly and work closely with the states to develop the plan to build the nationwide public safety broadband network as quickly as possible as delays to deployments may continue an unwarranted risk.

**The network must be affordable.** If the solution is not affordable, it could force jurisdictions to stay on commercial networks that won’t have the public safety enhancements that are anticipated for the new network. Leveraging carriers is one option to consider. Other options would be to consider leveraging local/regional assets and funding. The assets Fort Worth purchased as part of the early deployment process could be available to the region, state and FirstNet. Additionally States should be allowed to create local partnerships with local critical infrastructure providers to build, use, operate and maintain local Long Term Evolution (LTE) networks.

**The network must be designed as a mission-critical asset.** It must remain viable during emergencies, weather incidents, etc. Fort Worth uses carrier provided networks to support Public Safety during events that draw large numbers of the public. During events, these networks experience congestion and outages that routinely result in camera and other systems becoming unreliable – when cameras drop from 4G to 3G for instance, it means having to send personnel to incidents rather than relying on technology as the force multiplier. Additionally, if there were a major emergency, the network would likely be totally unavailable to Public Safety significantly impacting their ability to respond to the incident effectively.

**Local government and states should have some level of decision-making authority and control over the implementation of the network.** This will ensure local priorities and needs are addressed and opportunities to leverage equipment and processes are seized. Also it ensures good will is built between FirstNet and State / Local jurisdictions.

**The FirstNet Board should quickly establish a deployment process and approve the completion of early state and local public safety broadband systems.** The Board should encourage investment in a FirstNet early deployment process. It will allow targeted solutions to meet current critical needs. It will result in substantial investment from States and Local government entities which could be vital to the nationwide build out since current federal funding is not likely to be sufficient to complete the network in a timely manner. Additionally it will result in significant state and local adoption and address the issue of currently stranded equipment stranded.